

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

IN THE MATTER OF

N. Jonas & Co., Inc
1301 Adams Road
Bensalem, PA 19020

Noncompliant Hazardous Waste Activity
EPA ID No. PAR000503706
Bensalem Township
Bucks County

CONSENT ASSESSMENT OF CIVIL PENALTY

This Consent Assessment of Civil Penalty ("CACP") is entered into this 20th day of August, 2003, by and between the Commonwealth of Pennsylvania, Department of Environmental Protection ("Department") and N. Jonas & Co., Inc. ("Jonas").

The Department has found and determined the following:

A. The Department is the agency with the duty and authority to administer and enforce the Solid Waste Management Act, Act of July 7, 1980, P.L. 380, *as amended*, 35 P.S. §§ 6018.101-6018.1003 ("SWMA") and the rules and regulations promulgated thereunder.

B. N. Jonas & Co., Inc. is a Pennsylvania corporation that repackages bulk pool chemicals at its facility at 1301 Adams Road in Bensalem Township, Bucks County. Jonas generates hazardous waste in the normal course of operations at the facility. The facility is identified by EPA ID No. PAR000503706.

C. 1. On September 23, 2002, the Department conducted an inspection at the Jonas facility and determined that:

- a. Jonas failed to use a proper hazardous waste manifest, in violation of 40 CFR § 262.21 and 35 P.S. § 6018.403(b)(5),
- b. Jonas failed to fully develop and implement a PPC plan, in violation of 40 CFR § 262.34(a) and 35 P.S. § 6018.403(b)(10), and
- c. Jonas failed to properly label containers of hazardous waste, in violation of 40 CFR §§ 262.34(a) and 35 P.S. § 6018.403(b)(2).

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2. On January 15, 2003, the Department conducted an inspection at the Jonas facility and determined that Jonas still failed to fully develop and implement a PPC plan, in violation of 40 CFR § 262.34(a) and 35 P.S. § 6018.403(b)(10).

3. On March 20, 2003, the Department conducted an inspection at the Jonas facility and determined that Jonas had corrected the violations referenced in Paragraphs C.1. and C.2., above.

D. The violations described in Paragraph C.1. and C.2., above, constitute unlawful conduct and a public nuisance pursuant to Sections 610 and 601 of the SWMA, 35 P.S. §§ 6018.610 and 6018.601.

E. Section 605 of the SWMA, supra, 35 P.S. § 6018.605 provides that the Department may assess a civil penalty of up to TWENTY FIVE THOUSAND DOLLARS (\$25,000.00) per day for each violation of the Solid Waste Management Act.

After full and complete negotiation of all matters set forth in this CACP and upon mutual exchange of the covenants herein, the parties desiring to avoid litigation and intending to be legally bound, it is hereby ASSESSED by the Department and AGREED to by Jonas as follows:

1. **Assessment.** In resolution of the Department's claim for civil penalties, which the Department is authorized to pursue under Section 605 of the SWMA, 35 P.S. § 6018.605, the Department hereby assesses a civil penalty of SEVEN THOUSAND DOLLARS (\$7,000.00), which Jonas hereby agrees to pay.

2. **Civil Penalty Settlement.** Upon signing this CACP, Jonas shall pay the civil penalty assessed in Paragraph 1. This payment is in settlement of the Department's claim for civil penalties for the violations set forth in Paragraphs C.1. and C.2., above, for the dates set forth in Paragraphs C.1. and C.2., above. The payment shall be by corporate check or the like, made payable to **The Solid Waste Abatement Fund** and sent to

Nancy R. Roncetti
Waste Management Program
DEP Southeast Regional Office
Lee Park, Suite 6010
555 North Lane
Coashohocken, PA 19428

3. **Findings.**

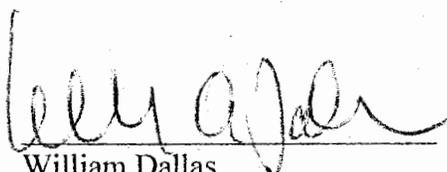
(a) Jonas agrees that the findings in Paragraphs A through E are true and correct and, in any matter or proceeding involving Jonas and the Department, Jonas shall not challenge the accuracy or validity of these findings.

(b) The parties do not authorize any other persons to use the findings in this CACP in any matter or proceeding.

4. **Reservation of Rights.** The Department reserves all other rights with respect to any matter addressed by this CACP, including the right to require abatement of any conditions resulting from the events described in the Findings. Jonas reserves the right to challenge any action which the Department may take, but waives the right to challenge the content or validity of this CACP.

IN WITNESS WHEREOF, the parties have caused this CACP to be executed by their duly authorized representatives. The undersigned representative(s) of Jonas certify, under penalty of law, as provided by 18 Pa. C. S. § 4904, that they are authorized to execute this CACP on behalf of Jonas that Jonas consents to the entry of this CACP as an ASSESSMENT of the Department; that Jonas hereby knowingly waives any right to a hearing under the statutes referenced in this CACP; and that Jonas knowingly waives its right to appeal this CACP, which rights may be available under Section 4 of the Environmental Hearing Board Act, the Act of July 13, 1988, P.L. 530, No. 1988-94, 35 P.S. § 7514; the Administrative Agency Law, 2 Pa. C.S. § 103(a) and Chapters 5A and 7A; or any other provision of law. Signature by Jonas's attorney certifies only that the agreement has been signed after consulting with counsel.

FOR
N. JONAS & CO., INC.:



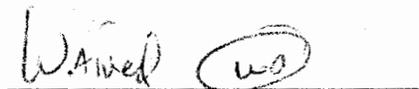
William Dallas
Controller

FOR
THE COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL
PROTECTION:

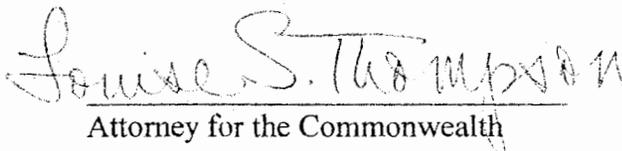


Ronald C. Furlan
Environmental Program Manager

Approved as to legality and form:



Attorney for Jonas



Attorney for the Commonwealth

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
 GENERATORS -- SMALL QUANTITY GENERATORS**

Site Name N. JOVAS + CO., INC. ID Number PA8000503706 Date 3/20/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4				REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name N. JONAS & CO., INC ID Number PAR000503706 Date 3/26/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
 GENERATORS -- SMALL QUANTITY GENERATORS
 FACILITY SPECIFICS**

Site Name N. JONAS & CO, INC ID Number PA 600503706 Date 3/20/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			LQG TANKS (Subchapter J)			
				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
				Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
 GENERATORS -- SMALL QUANTITY GENERATORS
 FACILITY SPECIFICS**

Site Name N. JONAS + CO, INC ID Number PAR000503706 Date 3/20/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			Containment Buildings (Subchapter T)			
				Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
				Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
	X			Drip Pads (Subchapter S)			
				Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
				Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 3/20/2003 Identification Number PAR 000503706

Company/Facility/Site Name N. JONAS & CO., INC.

INSPECTION CONDUCTED BY ALEX PAGE. JOHN STAFFORD, PRODUCTION FOREMAN, WAS THE FACILITY GUIDE. N. JONAS & CO., INC. BUYS POOL CHEMICALS IN BULK AND RE-PACKAGES THIS MATERIAL. ON OCTOBER 1, 2002, N. JONAS & CO., INC. WAS ISSUED 6 VIOLATIONS.

AT THIS INSPECTION, IT WAS DETERMINED THAT N. JONAS AND CO., INC. NOW USES A MANIFEST WHEN TRANSPORTING HAZARDOUS WASTE, NOW HAS A PPC PLAN WITH ALL REQUIRED ELEMENTS, NOW ACCURATELY LABELS HAZARDOUS WASTE CONTAINERS TO IDENTIFY THEIR CONTENTS, NOW CONTAINERS OF HAZARDOUS WASTE ARE LABELLED WITH THE WORDS "HAZARDOUS WASTE", NOW CONTAINERS OF HAZARDOUS WASTE ARE LABELLED WITH AN ACCUMULATION START DATE, AND NOW STEPS HAVE BEEN IMPLEMENTED TO PREVENT HOSE WASHING AND OTHER DISCHARGES

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date _____

Inspector (signature) _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 3/20/2003 Identification Number PAR000503706

Company/Facility/Site Name N. JONAS & CO., INC

FROM ENTERING THE ENVIRONMENT, N. JONAS &
CO., INC. IS NOW RETURNED TO COMPLIANCE.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date _____

Inspector (signature) Alf Page

11/22/04 CEI Compliance Evaluation 09/23/2002

Site: 053000 N JONAS & 053000

ACTV Active

General Visit Plan Insp Comp Asst Cover Area Admin

11/22/04	09/23/2002	062-20A	Manifest system not used to	03/20/2003	CRCTD
11/22/04	09/23/2002	062-34A*	Preparedness, Prevention	03/20/2003	

No of Violations: 2

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COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 1/15/2003
 Time Start 10:00 AM
 Time Finish 12:05 PM

HAZARDOUS WASTE INSPECTION REPORT

GENERATOR **S Q GENERATOR**

Company name N. JONAS & CO., INC I.D. Number PAR000503706
 Site Address 1301 ADAMS ROAD
 County BUCKS Municipality BENSALEM TWP. Zip 19020
 Name of Inspector ALEX PAGE
 Name & Title of Responsible Official JOHN STAFFORD - PRODUCTION MANAGER
 Person Interviewed JOHN STAFFORD Telephone (215) 639-5280
 Mailing Address (if different from above) SAME
 Amount of Hazardous Waste Generated per Month: 500 - VARIES Pounds _____ Kgs

1. Site Characterization:

STORAGE: Container Tanks Containment Bldg. Drip Pad Other _____
 PBR: Neutralization/WWTP Reclaim Other _____
 GENERATOR TREATMENT Containers Tanks Containment Bldg. Drip Pad

2. Universal Waste: Large Quantity Handler Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name UNIVAR USA License Number PA-AH0334
 Transporter Name S-J. TRANSPORTATION License Number PA-AH0015
 Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>D001</u>	<u>WASTE OXIDIZING SOLID</u>	<u>CLEAN HARBORS</u>
		<u>1910 RUSSELL ST</u>
		<u>BALTIMORE MD 21230</u>

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name N. JONAS & CO., INC. ID Number PA2000503706 Date 1/15/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
		X		PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name N. JONAS & CO., INC. ID Number PAR000503706 Date 1/15/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
 GENERATORS -- SMALL QUANTITY GENERATORS
 FACILITY SPECIFICS

Site Name N. JONAS & CO., INC ID Number PAR 000503706 Date 1/15/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
X				LQG TANKS (Subchapter J)			
				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
				Special small quantity generator requirements	265a.1	265.201	H048
X				SQG TANKS			
				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name N. JONAS & CO., INC ID Number PAR 000503706 Date 1/15/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			Containment Buildings (Subchapter T)			
				Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
			Y	Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
	X			Drip Pads (Subchapter S)			
				Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
			Y	Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 1/15/2003 Identification Number PAR000503706

Company/Facility/Site Name N. JONAS & CO., INC

INSPECTION CONDUCTED BY ALEX PAGE, WITH DENNIS HARNEY, COMPLIANCE SPECIALIST, IN ATTENDANCE. JOHN STAFFORD, PRODUCTION FOREMAN, WAS THE FACILITY GUIDE. N. JONAS & CO., INC. BUYS SWIMMING POOL CHEMICALS IN BULK AND RE-PACKAGES THESE CHEMICALS IN SMALLER QUANTITIES. JONAS EMPLOYS 35 PEOPLE WHO WORK 1 SHIFT.

ON OCT 1, 2002, N. JONAS & CO., INC WAS ISSUED A NOTICE OF VIOLATION FOR 6 HAZARDOUS WASTE VIOLATIONS. AT THIS INSPECTION, IT WAS DETERMINED THAT MANIFESTS ARE BEING USED WHEN TRANSPORTING HAZARDOUS WASTE. CONTAINERS OF HAZARDOUS WASTE ARE NOW ACCURATELY LABELLED TO IDENTIFY THEIR CONTENTS, NOW HAVE THE WORDS "HAZARDOUS WASTE" ON THE LABELS, AND HAVE ACCUMULATION START DATES ON THE LABELS.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____

Inspector (signature) _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 1/15/2003 Identification Number PAR000503706

Company/Facility/Site Name N. JONAS & CO., INC.

CONTAINERS OF WASTE CHLORINE ARE NOW KEPT
W/ LIDS ON THEM AND INSIDE THE BUILDING TO
MINIMIZE THE POTENTIAL OF POLLUTION TO WATERS
OF THE COMMONWEALTH. ONE VIOLATION IS STILL
OUTSTANDING: THE PPC PLAN IS PARTIALLY
DEvised BUT NOT COMPLETELY DEvised AND
NOT IMPLEMENTED. A DRAFT FORM IS AVAILABLE
BUT CERTAIN ELEMENTS ARE STILL TO BE
FILLED IN.

AT THE YARD AREA WALKAROUND A MUNICIPAL
WASTE DUMPSTER WAS OBSERVED TO BE LEAKING
AN OILY SUBSTANCE. JOHN STAFFORD AGREED TO
PUT "OIL DRY" ON THE SUBSTANCE AND TO
DETERMINE THE CAUSE OF THE DISCHARGE.

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Person interviewed (signature) _____ Date _____

Inspector (signature) _____

MARYLAND DEPARTMENT OF THE ENVIRONMENT
2500 Broening Highway Baltimore, Maryland 21224
(410) 631-3344 1-800-633-6101 (within Maryland) http://www.mde.state.md.us
HAZARDOUS WASTE PROGRAM
HAZARDOUS WASTE MANIFEST

NB480976

ORDER # 231462/1830

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039.

In case of an emergency or spill, immediately call the National Response Center at (800) 424-8802 and the MDE at (410) 631-3400. Nights and Holidays at (410) 974-3551.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. P A R 0 0 0 5 0 3 7 0 6		Manifest Document No. 2 2 0 0 2		2. Page 1 Of 1		Information in the shaded areas is not required by Federal law.							
3. Generator's Name and Mailing Address N JONAS CO. 1301 ADAMS ROAD BENSALEM, PA 190200425						A. State Manifest Document Number MDC 0981983									
4. Generator's Phone (800) 523-6533						B. State Generator's ID SAME									
5. Transporter 1 Company Name UNIVAR USA INC.						C. State Transporter's ID PA-12-0324									
6. US EPA ID Number E A R 0 0 0 3 9 4 9 5						HWH 112 035110 DC									
7. Transporter 2 Company Name S-J TRANSPORTATION CO.						D. Transporter's Phone 215-428-6990									
8. US EPA ID Number N J 0 0 7 1 6 2 9 9 7 6						HWH 112 035110 DC									
9. Designated Facility Name and Site Address CLEAN HARBORS SERVICES INC. 1910 RUSSELL STREET BALTIMORE, MD 21230						E. Transporter's Phone 856-769-2741									
10. US EPA ID Number M D D 9 8 0 5 5 1 8 9						F. State Facility ID A151									
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		Waste No.			
a. RO, WASTE OXIDIZING SOLID, N.O.S. (TRICHLOROISOCYANURIC ACID) 5.1. UN1479. PG II. (RC=100). (EPA D001). (ERG 140)						008		03200		P		D 0 0 1			
b. RO, WASTE OXIDIZING SOLID, N.O.S. (DICHLOROISOCYANURIC ACID) 5.1. UN1479. PG II. (RC=100). (EPA D001). (ERG 140)						002		00800		P		D 0 0 1			
c. RO, WASTE CALCIUM HYPOCHLORITE, DRY 5.1. UN1748. PG II. (RC=10). (EPA D001). (ERG 140)						011		4400		P		D 0 0 1			
d.															
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above									
Haz. Code		Physical State		Specific Gravity		Percentage		Haz. Code		Physical State		Specific Gravity		Percentage	
a. I		S				100.		c. I		a				100.	
11a. CH23454						11c. CH24132						a. S		c. S	
b. I		S				100.		d.							
11b. CH23460												b. S		d.	
15. Special Handling Instructions and Additional Information <p align="center">WEAR APPROPRIATE PROTECTIVE GEAR WHEN HANDLING.</p> <p>EMERGENCY CONTACT: CHEMTREC: 1-800-424-9300. CALLER MUST IDENTIFY UNIVAR USA AS SHIPPER.</p> <p>RECEIVED BY CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Maryland Statutes or Regulation.</p> <p>If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.</p>															
Printed/Typed Name John Stafford						Signature <i>John Stafford</i>						Month Day Year 11 0 13 02			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name MATTHEW DONS						Signature <i>Matthew C. Dons</i>		Month Day Year 11 0 23 02	
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name DAVE KARBAN						Signature <i>D. Karban</i>		Month Day Year 11 0 23 02	
19. Discrepancy Indication Space															
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.															
Printed/Typed Name Michael J. ...						Signature <i>Michael J. ...</i>						Date 11 0 23 02			

MDC 0981983

8 of 11



COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 9/23/02
 Time Start 10:30 AM
 Time Finish 12:30 PM

HAZARDOUS WASTE INSPECTION REPORT
 GENERATOR **S Q GENERATOR**

Company name N. JONAS AND CO INC. I.D. Number PAR000503706
 Site Address 1301 ADAMS RD BENSALEM
 County BUCKS Municipality BENS. TWP. Zip 19020
 Name of Inspector ALEX PAGE
 Name & Title of Responsible Official JOHN STAFFORD - PROD. MGR
 Person Interviewed JOHN STAFFORD Telephone (215) 639-5280
 Mailing Address (if different from above) -
 Amount of Hazardous Waste Generated per Month: 700 - ? Pounds _____ Kgs _____

1. Site Characterization:

STORAGE: Container Tanks Containment Bldg. Drip Pad Other _____
 PBR: Neutralization/WWTP Reclaim Other _____
 GENERATOR TREATMENT Containers Tanks Containment Bldg. Drip Pad

2. Universal Waste: Large Quantity Handler Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name ELK TRANSPORTATION License Number PA AH 0413
 Transporter Name _____ License Number _____
 Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>003</u>	<u>TRICHLORO-3-TRIAZINETRONE</u>	<u>PERRA-FIX OF DAYTON</u>
		<u>300 S. WEST END AV</u>
		<u>DAYTON OHIO</u>

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
 GENERATORS -- SMALL QUANTITY GENERATORS**

Site Name TOMAS CO., INC ID Number PA2000503706 Date 9/23/02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
		X		Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
		X		Subsequent notification requirements met	262a.12(b)		H004
			X	Proper manifest used	262a.10	262.21	H005
			X	Manifests filled out correctly and completely	262a.20		H006
			X	Manifests signed and routed properly	262a.23(a)	262.23	H007
		X		Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
		X		Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
		X		Exception reporting procedures followed	262a.42	262.42	H016
		X		Spill reporting procedures followed	262a.10	262.34(d)	H017
			X	PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
		X		Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
 GENERATORS -- SMALL QUANTITY GENERATORS
 FACILITY SPECIFICS**

Site Name JOWAS CO., INC ID Number PA000503706 Date 4/23/02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
			X	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
			X	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
			X	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
			X	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
 GENERATORS -- SMALL QUANTITY GENERATORS
 FACILITY SPECIFICS**

Site Name JONAS CO., INC ID Number PAR00050370L Date 9/23/02
 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
	X			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
			✓	Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
	X			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
 GENERATORS -- SMALL QUANTITY GENERATORS
 FACILITY SPECIFICS**

Site Name JONAS CO, INC ID Number PAR006503706 Date 9/23/02
 1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			Containment Buildings (Subchapter T)			
	↓			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
	↓			Meets special requirements if liquids present	265a.1	265.1101(b)	H062
	↓			Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
				Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
	X			Drip Pads (Subchapter S)			
	↓			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
	↓			Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
	↓			(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
				Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 9/23/2002 Identification Number PAR000503706

Company/Facility/Site Name N. JONAS + CO. INC.

INSPECTION CONDUCTED BY ALEX PAGE. JOHN STAFFORD
PRODUCTION FOREMAN, WAS THE FACILITY GUIDE. JONAS INC.
BUYS POOL CHEMICALS IN BULK AND RE-PACKAGES
THIS MATERIAL. THIS INSPECTION IS A RESULT OF
A FIRE IN A DUMPSTER RESULTING FROM THE IMPROPER
DISPOSAL OF REACTIVE WASTE.

IN THE YARD AREA UNKNOWN DRUMS OF
HAZARDOUS WASTE WERE PLACED. JOHN STAFFORD
STATED THAT THESE DRUMS HAVE BEEN TESTED AND
ANALYSIS RESULTS WERE PENDING. FOUR LEAD ACID
BATTERIES WERE IMPROPERLY STORED. IN THE "TABLET
PRESS" ROOM GRANULAR CHLORINE WAS OBSERVED SPILLED
ON THE FLOOR. A TANKER TRUCK WAS UNLOADING
BULK ALGAEICIDE AT THE TIME OF INSPECTION -- HOSE
WASHINGS WERE DISCHARGED TO THE ENVIRONMENT.
HOUSEKEEPING WAS POOR BOTH INSIDE THE BUILDING
AND IN THE YARD AREA.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____

Inspector (signature) Alex Page

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 9/23/2002 Identification Number PAR000503706

Company/Facility/Site Name JONAS CO., INC

ON 1/2/02 APPROX. 38,120 P. OF WASTE
CHLORINE WAS DISPOSED USING A STRAIGHT BILL
OF LADING AND NOT A MANIFEST. RECORDKEEPING
IS NOT WELL ORGANIZED AND POSSIBLY OTHER
SHIPMENTS WERE MADE WITHOUT MANIFESTS.
NO P.P.C. WAS AVAILABLE
WEEKLY INSPECTION LOGS OF HAZ. WASTE
STORAGE AREA WERE AVAILABLE.

- VIOLATIONS : 262.2.10 - NO MANIFEST
- 262.2.10 - NO PPC PLAN
- 262.2.10 - CONTAINER NOT MANAGED PROP.
- 262.2.10 - NO ACCUM START DATE
- 262.2.10 - NOT LABELED HAZ WASTE
- 6018.403 - NOT ACCURATELY IDENTIFIED CONTENTS
- 265/402 - FACILITY NOT MANAGED PROPERLY

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This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____

Inspector (signature) Ally Page



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 11/21/2001
Time Start 2:30
Time Finish 3:30

HAZARDOUS WASTE INSPECTION REPORT

GENERATOR **S Q GENERATOR**

Company name N. JONAS & CO., INC. I.D. Number PAR 000503706
Site Address 4520 ADAMS CIRCLE BENSLEM PA 19020
County BUCKS Municipality BENSLEM TWP. Zip 19020
Name of Inspector ALEX PAGE
Name & Title of Responsible Official JOHN STAFFORD - PRODUCTION FOREMAN
Person Interviewed JOHN STAFFORD Telephone (215) 639-5280
Mailing Address (if different from above) SAME
Amount of Hazardous Waste Generated per Month: 2000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: Container Tanks Containment Bldg. Drip Pad Other _____
PBR: Neutralization/WWTP Reclaim Other _____
GENERATOR TREATMENT Containers Tanks Containment Bldg. Drip Pad

2. Universal Waste: Large Quantity Handler Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name ELK TRANSPORTATION License Number PA AH 0413
Transporter Name _____ License Number _____
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>D001</u>	<u>WASTE OXIDIZING SOLID</u>	<u>PERMA-FIX OF</u>
	<u>-WASTE TRICHLORO-S-</u>	<u>ORLANDO</u>
	<u>TRIAZINETRINE</u>	<u>10100 ROCKET BLVD.</u>
		<u>ORLANDO, FL.</u>
		<u>32824</u>

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
 GENERATORS -- SMALL QUANTITY GENERATORS**

Site Name N. JONAS & CO., INC ID Number PAR000503706 Date 11/21/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
	X			PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	X			Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
 GENERATORS -- SMALL QUANTITY GENERATORS
 FACILITY SPECIFICS

Site Name N. JONAS & CO., INC ID Number PAR000503706 Date 11/21/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
		X		Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
		X		Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
		X		Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
		X		Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
		X		Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
 GENERATORS -- SMALL QUANTITY GENERATORS
 FACILITY SPECIFICS**

Site Name N. JONAS & CO., INC. ID Number PAR000503706 Date 11/21/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
	X			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
				Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
	X			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
 GENERATORS -- SMALL QUANTITY GENERATORS
 FACILITY SPECIFICS**

Site Name N. JONAS & CO., INC. ID Number PAR000503706 Date 11/21/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			Containment Buildings (Subchapter T)			
				Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
			↓	Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
				Drip Pads (Subchapter S)			
	X			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
			↓	Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11/21/2001 Identification Number PAR 000503706Company/Facility/Site Name N. JONAS & CO., INC.

INSPECTION CONDUCTED BY ALEX PAGE. JOHN STAFFORD, PRODUCTION MANAGER, WAS THE FACILITY GUIDE. N. JONAS & COMPANY'S BUSINESS IS THE DE-BULKING AND RE-PACKAGING OF SWIMMING POOL CHLORINE. THEIR ONLY ^{HAZ.} WASTE STREAM IS WASTE TRICHLORO-S-TRIAZINETRINE A STRONG OXIDIZING SOLID. RECENT HOUSEKEEPING OPERATIONS RESULTED IN TWO SHIPMENTS OF HAZARDOUS WASTE -- ON 7/9/01 -- 44,200 POUNDS AND ON 7/18/01 45,720 POUNDS. THESE SHIPMENTS WERE SENT UNDER TEMP. HAZ. ID # PADEP 0008917. A PERMANENT ID NUMBER HAS BEEN OBTAINED -- # PAR000503706.

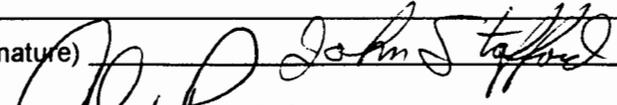
MANIFESTS WERE AVAILABLE AND APPEARED PROPERLY COMPLETED AND ROUTED WITHIN TIME LIMITS

PERSONNEL TRAINING SIGN-IN SHEETS WERE AVAILABLE. JOHN STAFFORD STATED THAT COURSE DESCRIPTION INFORMATION WOULD BE FORTHCOMING.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)  Date 11/27/01

Inspector (signature) 

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11/21/2001 Identification Number PAR 000503706

Company/Facility/Site Name N. JONAS & SONS

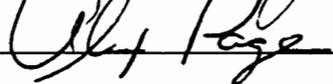
JOHN STAFFORD ALSO STATED THAT HE IS IN
THE PROCESS OF DEVELOPING AN ^{APPROVED} P.P.C. PLAN AND
AND WEEKLY HAZARDOUS WASTE INSPECTION
STORAGE AREA CHECKLIST, WITH SOME ADDED
INFORMATION.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)  Date 11/27/01

Inspector (signature) 



COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 11/21/2001
 Time Start 2:30
 Time Finish 3:30

HAZARDOUS WASTE INSPECTION REPORT
 GENERATOR **S Q GENERATOR**

Company name N. JONAS & CO., INC. I.D. Number PAR 000503706
 Site Address 4520 ADAMS CIRCLE BENSALEM PA 19020
 County BUCKS Municipality BENSALEM TWP. Zip 19020
 Name of Inspector ALEX PAGE
 Name & Title of Responsible Official JOHN STAFFORD - PRODUCTION FOREMAN
 Person Interviewed JOHN STAFFORD Telephone (215) 639-5280
 Mailing Address (if different from above) SAME
 Amount of Hazardous Waste Generated per Month: 2000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: Container Tanks Containment Bldg. Drip Pad Other _____
 PBR: Neutralization/WWTP Reclaim Other _____
 GENERATOR TREATMENT Containers Tanks Containment Bldg. Drip Pad

2. Universal Waste: Large Quantity Handler Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name ELK TRANSPORTATION License Number PA AH 0413
 Transporter Name _____ License Number _____
 Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>D001</u>	<u>WASTE OXIDIZING SOLID</u>	<u>PERMA-FIX OF</u>
	<u>-WASTE TRICHLORO-S-</u>	<u>ORLANDO</u>
	<u>TRIAZINETRINE</u>	<u>10100 ROCKET BLVD.</u>
		<u>ORLANDO, FL.</u>
		<u>32824</u>

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS**

Site Name N. JONAS & CO., INC ID Number PAR000503706 Date 11/21/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
	X			PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	X			Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name N. JONAS & CO., INC ID Number PA R000503706 Date 11/21/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
		X		Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
		X		Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
		X		Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
		X		Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
		X		Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF ENVIRONMENTAL PROTECTION
 BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
 GENERATORS -- SMALL QUANTITY GENERATORS
 FACILITY SPECIFICS**

Site Name N. JONAS & CO., INC. ID Number PAR000503706 Date 11/21/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
	X			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
				Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
	X			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name N. JONES & CO., INC. ID Number PAR000503706 Date 11/21/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			Containment Buildings (Subchapter T)			
				Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1) (ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
			√	Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
				Drip Pads (Subchapter S)			
	X			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
			√	Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11/21/2001 Identification Number PAR 000503706Company/Facility/Site Name N. JONAS & CO., INC.

INSPECTION CONDUCTED BY ALEX PAGE. JOHN STAFFORD, PRODUCTION MANAGER, WAS THE FACILITY GUIDE. N. JONAS & COMPANY'S BUSINESS IS THE DE-BULKING AND RE-PACKAGING OF SWIMMING POOL CHLORINE. THEIR ONLY ^{HAZ.} WASTE STREAM IS WASTE TRICHLORO-S-TRIAZINETRINE A STRONG OXIDIZING SOLID. RECENT HOUSEKEEPING OPERATIONS RESULTED IN TWO SHIPMENTS OF HAZARDOUS WASTE -- ON 7/9/01 -- 44,200 POUNDS AND ON 7/18/01 45,720 POUNDS. THESE SHIPMENTS WERE SENT UNDER TEMP. HAZ. ID # PAR0008917. A PERMANENT ID NUMBER HAS BEEN OBTAINED -- # PAR000503706.

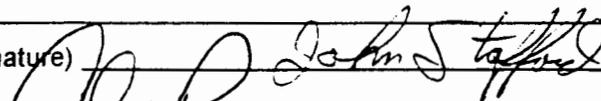
MANIFESTS WERE AVAILABLE AND APPEARED PROPERLY COMPLETED AND ROUTED WITHIN TIME LIMITS PERSONNEL TRAINING SIGN-IN SHEETS WERE AVAILABLE. JOHN STAFFORD STATED THAT COURSE DESCRIPTION INFORMATION WOULD BE FORTHCOMING.

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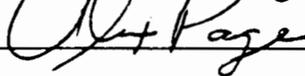
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Person interviewed (signature)


Date 11/27/01

Inspector (signature)



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11/21/2001 Identification Number PAR 000503706

Company/Facility/Site Name N. JONAS & SONS

JOHN STAFFORD ALSO STATED THAT HE IS IN
THE PROCESS OF DEVELOPING A P.P.C. PLAN AND
AND WEEKLY HAZARDOUS WASTE INSPECTION
STORAGE AREA CHECKLIST.

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Person interviewed (signature) 

Date 11/27/01

Inspector (signature) 



Inspection ID: Job Type: Compliance Evaluation Date Received:

Inspected Entity

Cell	Site	Entry	053048		N JONAS & CO INC	Program Specific ID	053048
Type						Status	ACTIV Active
MOE SF							
SP Status							

General Visit Comp. Act Cover Area Admin

Owner/Operator:

Complaint ID: Inspector: PAGE, ALEX

Due Date: Inspection Report: No Violations Noted

Date Scheduled: Scheduled By:

Agency: PA Dept of Environmental Protection External Joint Insp

Program: TCS Code: DE REGIONAL OFFICE, CONSPOND External Details

FF Related Info: County: Municipality:

Inspection ID				
Record: 1/1			KOSC	KDBG

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation is identified below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Biennial Reports that generators of hazardous waste, and owner and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA ID No.:

PAR000503706

Installation Address:

N JONAS & CO INC
4520 ADAMS CIRCLE
BENSALEM, PA 19020

Mailing Address:

1301 ADAMS RD
BENSALEM, PA 190200425
Attn: JOHN STAFFORD, PRODUCTION MGR

ATTENTION: All initial and subsequent Notifications of Regulated Waste Activity submitted after October 1, 2001, should be sent to the following address:

PADEP
P.O. Box 8471
Harrisburg, PA 17105-8471

Please refer to Section V. Line-by-Line instructions for Completing EPA Form 8700-12 before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

AUG 1 1999

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

A. Initial Notification

B. Subsequent Notification
(Complete item C)

C. Installation's EPA ID Number
PA 000503700

II. Name of Installation (Include company and specific site name)

N. Jonas and Co. Inc. PA000503700

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

4520 Adams Circle

Street (Continued)

City or Town

Bensalem

State

PA

Zip Code

19020-

County Code

017BUCKS

County Name

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

P.O. Box 425

City or Town

Bensalem

State

PA

Zip Code

19020-0425

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

Stafford

(First)

John

Job Title

Production Mgr.

Phone Number (Area Code and Number)

215-639-5280

VI. Installation Contact Address (See instructions)

A. Contact Address Location

B. Street or P.O. Box

1301 Adams Road

City or Town

Bensalem

State

PA

Zip Code

19020-0425

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

Steph Jonas

Street, P.O. Box, or Route Number

P.O. Box 425

City or Town

Bensalem

State

PA

Zip Code

19020-0425

Phone Number (Area Code and Number)

215-639-8071

B. Land Type

R

C. Owner Type

B

D. Change of Owner Indicator

Yes No

Date Changed

Month Day Year

ID - For Official Use Only			

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions)

A. Hazardous Waste Activities

1. Generator (See Instructions)
- a. Greater than 1000kg/mo (2,200 lbs.)
 - b. 100 to 1000 kg/mo (220-2,200 lbs.)
 - c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- a. For own waste only
 - b. For commercial purposes
- Mode of Transportation
- 1. Air
 - 2. Rail
 - 3. Highway
 - 4. Water
 - 5. Other - specify
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3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity, see instructions.
4. Exempt Boiler and/or Industrial Furnace
- a. Smelting, Melting, and Refining Furnace Exemption
 - b. Small Quantity On-Site Burner Exemption
5. Underground Injection Control

NOT
a-transport

C. Used Oil Management Activities

1. Used Oil Transporter/Transfer Facility - Indicate Type(s) of Activity(ies)
- a. Transporter
 - b. Transfer Facility
2. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- a. Processor
 - b. Re-refiner
3. Off-Specification Used Oil Burner
4. Used Oil Fuel Marketer
- a. Marketer Who Directs Shipment of Off-Specification Used Oil to Used Oil Burner
 - b. Marketer Who First Claims the Used Oil Meets the Specifications

B. Universal Waste Activity

- Large Quantity Handler of Universal Waste

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1 D001	2	3	4	5	6
7	8	9	10	11	12

B. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24; See instructions if you need to list more than 4 toxicity characteristic waste codes.)

(List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

C. Other Wastes. (State-regulated or other wastes requiring a handler to have an I.D. number; See instructions.)

1	2	3	4	5	6
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X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature <i>John Stafford</i>	Name and Official Title (Type or print) John Stafford Production Mgr.	Date Signed 7/23/01
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XI. Comments

Ban/LB/820-01

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section IV of the booklet for addresses.)